

ARASH DIBAZAR
2229 Lincoln Ave
San Jose, CA 95125
(408) 608-8036

FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND

2017 JAN 26 AM 10:38

CLERK OF COURT
AT BALTIMORE

BY _____ DEPUTY

UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND

ARASH DIBAZAR
2229 LINCOLN AVE
SAN JOSE, CA 95125,
Plaintiff

v.

ALEXANDER ROSE QUINTANA
6 VIEWRIDGE DRIVE APT A
NOTTINGHAM, MD 27213,
Defendant

Civil Action No. _____

GLR 17 CV 0237

COMPLAINT

JURY TRIAL DEMANDED

Plaintiff ARASH DIBAZAR, In Propria Persona, for his Complaint against Defendant
ALEXANDER ROSE QUINTANA, alleges as follows:

JURISDICTION AND VENUE

1. This Court has subject matter jurisdiction over Dibazar's claims pursuant to 28 U.S.C. § 1332(a)(1) because the matter in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs, and is between citizens of different States.

2. This Court has personal jurisdiction over Quintana pursuant to Rule 4(c) of the Federal Rules of Civil Procedure. Quintana transacts continuous and systematic business in Maryland and in this judicial district and his defamatory statements were published from and to the County of Baltimore, and the County of Santa Clara, California published to and in fact

seen in other places accessible to the internet including Baltimore County.

3. Venue is proper under 28 U.S.C. § 1391(a)(2) because all or a substantial portion of the events that gave rise to Plaintiff's claims transpired in Maryland, including the publication or republication of the defamatory falsehoods and the damage to Plaintiff's reputation.

PARTIES

4. Plaintiff Arash Dibazar, ("Dibazar") is an individual who is the Founder and CEO of Imc Academy LLC. Dibazar has dedicated every one of his days to the betterment of individuals worldwide. Dibazar has spent his entire life studying the concepts of martial arts and applied his mental discipline, acuity and strong philosophies into the many fields of business he works with. He helps women become strong, confident and successful through his women's fitness center; impacting thousands of families within California and worldwide. He works with men in learning responsibility, communication, strength and protection to also impact their peers and family to be the best individuals they can be. With such influence and drive; Dibazar pushes forward his philosophy and ideals through the success of others. Dibazar is a resident of California and licensed to do business in California.

5. Defendant Alexander Rose Quintana ("Quintana") is a former client and is a resident of the State of Maryland, in the County of Baltimore.

STATEMENT OF FACTS

6. Plaintiff incorporates by reference paragraphs 1-5.

7. Plaintiff Founded Imc Academy LLC 18 years ago. This includes Imc Women's Fitness Center which sees approximately 200 women per day in group classes and personal training. The instructors at IMC Women's Fitness Center have been personally trained by


Arash Dibazar himself in the IMC ideal and philosophies. The IMC Philosophy reads as such, "It's all in a state of mind", as well as "Be beautiful on the inside and outside", they are used to build women's self-confidence, image, fitness, body physique, knowledge of health and nutrition as well as self-defense. Every business completely changes the life experience, ethics and success level of each member for the greater good. These results and concepts in turn, directly affect each member's family and friends impacting thousands of people within the community as well as worldwide; Imc Survival Center; Doll-Face Beauty Bar by Imc Academy that was opened two weeks ago; Seductive Instinct opened six years ago; and The Arashzepar.com opened 1 year ago.


8. Defendant, Quinatana was a former client of the Seductive Instinct. One of the other Patrons from IMC Women's Fitness Center was being stalked by Defendant. Plaintiff stepped in and defended the young woman and has been a target of the Defendant's Defamation, Slander and Libel ever since.


9. The slander taken place is intended to stop Dibazar's communication and destroy the work that he does to help better our society. The slander taken place is all here say and is sent out on social media platforms in which his fans and followers can see the disgusting trash talk towards him. Most of all of Dibazar's fans and followers will absolutely stand up for Dibazar and communicate back to the slander with intentions to put out the truth; however, There would never be a clear way to see how many eye balls have seen the unsatisfactory, untrue nonsense being stated to defame his work and name.


10. Defendant, Quintana uses the twitter handle @foxwalkin. Defendant has published the following:

ON TWITTER

 **Alexander Rose** · foxwalkin · Aug 8
This guy is a real piece of work. [instagram.com/p/BI35XpQgQM/](https://www.instagram.com/p/BI35XpQgQM/)...
#rapeculture #feminism

 **Alexander Rose** · foxwalkin · Aug 9
More from this douche "Your intelligence is of no value to a man"
[instagram.com/p/BI6GlaJg7Q/](https://www.instagram.com/p/BI6GlaJg7Q/)... #endabuse #feminism #rapeculture
#sexualharassment

 **Alexander Rose** · foxwalkin · Aug 10
Here's a small clip of this guy, I can't even bare to repeat it:
[vocaroo.com/i/s0agpA3toEZ4](https://www.vocaroo.com/i/s0agpA3toEZ4) #endabuse #rapeculture #psychopathy
#feminism


 **Alexander Rose** · foxwalkin · Aug 14
[youtube.com/watch?v=3s3niF...](https://www.youtube.com/watch?v=3s3niF...)
#TakeDownArashDibazar #endabuse
#sexualharassment #domesticviolence
#sexualassault #feminism #feminist
#animalabuse



The Truth About Arash Dibazar Part 1

Arash Dibazar owns IMC Women's Fitness Center and
IMC Survival and Fight Center both in San Jose
California where he teaches women and children.

[youtube.com](https://www.youtube.com)

 Alexander Rose · foxwalkin · Aug 21


Arash Dibazar talks about drugging women to have sex with them youtu.be/jREHAVvbd4 #endabuse #rape #daterape #rapeculture #feminism



Arash Dibazar Exposed - Feeding Women Molly an...

Arash Dibazar uses his niece Ivy to manipulate viewers' emotions into melting for him and thinking he is a good human being. Watch as he talks about spoon fe...

youtube.com

 Alexander Rose · foxwalkin · Nov 16

If you want to follow me on here DM me I will give you the Twitter. I won't post it here for the undocumented sex offender to see.

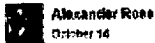
 Alexander Rose · foxwalkin · Nov 16

Yes, I am calling him the undocumented sex offender bc that's what he is.

 Alexander Rose · foxwalkin · Nov 16

To all my followers: I am closing down this Twitter. Keep an eye on therosediaries.org . Fans of my War on Arash it will explode there.

FACEBOOK



Alexander Rose

October 14

So now that this is a PUA only FB with lots of my real world friends on it, HELLFIRE is going to RAIN on Arash "I'm a fucking faggot" Dibazar.

7

11 Comments

Like

Share



Alexander Rose

November 8

Last post before I permanently leave the PUA community in 24 hours, in hopes I can wake up at least a couple people - but I am just done. It has become clear I am way more evolved and independent than most people in this community, and I have an empire to build. No time to educate those who don't want to be educated.

And to those who want to play the "your opinion" game, nah bro. It's not an opinion whether someone does or does not commit heinous acts towards women or towards other people. If you believe that well - I have already said it. No respect whatsoever for fools.

Enjoy the last you will ever hear of "Alexander Rose"



Take Down Arash Dibazar

youtube.com

11

7 Comments

YouTube.com

https://www.youtube.com/watch?v=3s3niF7EgJk&list=PLXuuzd5pE6J9P71OeO_4CVvl6bsA1ENqr&index=1

The Truth About Arash Dibazar Part 1



Alexander Rose

Published on Aug 14, 2016

Arash Dibazar owns IMC Women's Fitness Center and IMC Survival and Fight Center both in San Jose California where he teaches women and children.

https://www.youtube.com/watch?v=jREHAVvbd4&list=PLXuuzd5pE6J9P71OeO_4CVvl6bsA1ENqr&index=2

Arash Dibazar Exposed - Feeding Women Molly and Child Exploitation



Alexander Rose

Published on Aug 21, 2016

Arash Dibazar uses his niece Ivy to manipulate viewers' emotions into melting for him and thinking he is a good human being.

Watch as he talks about spoon feeding women Molly with such excitement as a kid in a candy store, followed by allegations from a woman

https://www.youtube.com/watch?v=j0vZiYLuYF8&list=PLXuuzd5pE6J9P71OeO_4CVvl6bsA1ENqr&index=3

Arash Dibazar Exposed Part 3: The Girlfriend
Contract and Forced Abortion



Alexander Rose

Published on Aug 30, 2016

- *Category*
 - Nonprofits & Activism
- *License*
 - Standard YouTube License

<http://escalatefast.tumblr.com/>

The Rose Diaries



Arash Dibazar Exposed - Feeding Women Molly a



Arash Dibazar talks about using his baby niece to emotionally manipulate his followers/viewers and talks about drugging women in order to have sex with them. This man needs to be stopped. See my earlier video where he talks about praying that his ex-girlfriends are raped on a daily basis and saying that you should treat women like dogs!

About

I am an Trainer with SeductionCoaching.com who has been training with Vince Kelan for over 3 year and a half, and in the community for over two and a half years. He coached infidel at the Global Pickup Conference in Washington DC, and also during Vince's bootcamps.

Most recently I spent a month and a half at Project Hollywood, where the infamous book "The Game" was written and then coached infidel at Pickup Academy 2012, also held at Project Hollywood.

I also run Baltimore's No-style Academy in Baltimore where I run inner game workshops and stage-dance style events and do one on one coaching.

What people have said about me:

"I've been out with so many guys say they have game. Alex proves he walks the walk." - Technoslaughter, masterpickupartists.com

"Alex is a TRUE SUCCESS STORY, learn from him." - Vince Kelan, SeductionCoaching.com

Aug 21

takedownarashdibazar, abuse, feminism, rape, date rape, rape culture, sexual assault, rape culture, and abuse, domestic violence, relationships, domestic violence, women's rights, women's revolution

The Truth About Arash Dibazar Part 1



Arash Dibazar owns IMC Women's Fitness Center in San Jose California. A place where women are supposed to feel safe. Would you feel safe knowing this guy owns the place you're working out at?

He also owns a martial arts academy where he teaches children Brazilian Jiu Jitsu as well as Tae Kwon Do and has post-class lectures where he teaches this drivel to men and women in his classes.

This is taken from lectures taught to men on how to have relationships with women.

"I've been out with so many guys say they have game. Alex proves he walks the walk." - Technoslaughter, masterpickupartists.com

"Alex is a TRUE SUCCESS STORY, learn from him." - Vince Kelan, SeductionCoaching.com

"I have seen [Alex] progress more than anyone I ever coached, and duplicate some of the craziest pickups it took me over 20 years to achieve." - Vince Kelan, SeductionCoaching.com

"one of Vince's top trainers" - Maven, Kings of Pickup

"What I like about you Alex is you have no approach anxiety, so I don't have to worry about pushing you into sex." - Red Man, Kings of Pickup

"I've met more women today than I have in the last entire month!" - Khan

"This was a great event that helped me a lot to build confidence and have a more focused inner game. Thank you Alex for putting this on." - Michael J.

"Alex is on his way to becoming a powerful healer. We did some really powerful work. Not what I expected, I feel a bit like I was turned upside down and am still processing. Many good lessons about being ok with who I am and being bold about it. He is a supportive and fearless guide who has helped me bring about a profound release, change, and opening so that I am now able to live and speak my truth more freely and boldly. Much gratitude and lots of love to you, Alex!" - Kristy

COUNT 1-DEFAMATION-PER SE

11. Plaintiff incorporates by reference paragraphs 1- 10.
12. Mr. Quintana published via the Websites, Twitter.com, Facebook.com, Youtube.com and Tumbler.com the statements listed in paragraph 10, *supra*, in places accessible to the general public, and particularly likely to come to the attention of persons who search for information on Arash Dibazar and IMC Academy LLC.
13. These statements were made about Arash Dibazar.
14. These statements were seen by someone other than Arash Dibazar.
15. These statements were allegations that Arash Dibazar committed a crime of moral turpitude, specifically the crime of an “undocumented sex offender” “#endabuse” “#Sexualharassment” “#Domesticviolence” “drugging women to have sex with them” “#rape” and “#daterape”.
16. The statements were false.
17. Mr. Quintana made these statements knowing them to be false and with reckless disregard of whether they were false or not. Defendant Quintana, actually edited the videos leaving out crucial aspects of the seminars.
18. The danger of injury to Arash Dibazar’s reputation from such words is readily apparent.
19. Arash Dibazar has been harmed by these attacks including loss of work opportunities in an amount of at least \$100,000 and an estimated \$2,500,000, harm to and loss of business reputation, insult, and anxiety.
20. Arash Dibazar is damaged by Mr. Quintana.
21. Mr. Quintana’s actions were malicious and showed intentional disregard for Dibazar’s

rights, and accordingly punitive damages are appropriate against Mr. Quintana.

COUNT 2-DEFAMATION-PER SE

22. Plaintiff incorporates by reference paragraphs 1- 21.

23. The Statements impute to Plaintiff a criminal violation of being a sex offender, for which, if true, he may be punished by a fine, jail time, and a requirement to register as a sex offender. The publication and republication of the Statements proximately caused general and special damages to Plaintiff. Defendant knew, anticipated, foresaw, created and intended that the Statements would be read by persons throughout the United States and the world and would damage the reputation of the Plaintiff. The Statements have adversely affected Plaintiff's life coach credibility, speaking, writing and publishing opportunities, book sales, and cause psychological and emotional trauma and suffering.

COUNT 3-DEFAMATION-PER SE

24. Plaintiff incorporates by reference paragraphs 1- 23.

25. The Statements, individually and collectively, referred to herein have caused, are causing, and will cause Plaintiff to suffer injury to his professional standing, to his reputation and good name; and, they have held and will continue to hold Plaintiff up to public scandal and ridicule. The statements were calculated to, and do, expose Plaintiff to public scorn, hatred, and ridicule. By such published Statements, Defendant did injure the Plaintiff's reputation within his professional circles and in the community at large. The publication of the Statements proximately caused general and special damages to the Plaintiff. The Statements have adversely impacted Plaintiff's credibility, and opportunities for writing, teaching, speaking, and book sales. The Statements have damaged Plaintiff's professional standing in the life coaching community. The Statements have proximately caused Plaintiff emotional and

psychological trauma and suffering which is continuing.

PRAYER FOR RELIEF

26. Plaintiff demands judgment against Defendant as follows: (i) for compensatory damages in the amount of \$2 million (\$2,000,000) on Count 1, \$2 million (\$2,000,000) on Count 2 and \$2 million (\$2,000,000) on Count 3; (ii) punitive damages in the amount of \$2 million (\$2,000,000) on Count 1, \$2 million (\$2,000,000) on Count 2 and \$2 million (\$2,000,000) on Count 3; (iii) both pre-judgment and post-judgment interest on all three Counts; and (iv) such other and further relief as the Court find just and equitable.

JURY TRIAL

Plaintiff demand a jury trial.

Respectfully Submitted



ARASH DIBAZAR

2229 Lincoln Ave
San Jose, CA 95125
(408) 608-8036